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Attorneys for Defendants  
QUALITY SYSTEMS, INC. and NEXTGEN HEALTHCARE INFORMATION  
SYSTEMS, LLC

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION**

TRACI WOLBERT,

Plaintiff,

vs.

QUALITY SYSTEMS, INC. NEXTGEN  
HEALTHCARE INFORMATION  
SYSTEMS, and DOES 1 through 10,  
INCLUSIVE,

Defendants.

CASE NO. CV-8:15-cv-00550-JLS-RNB

[Assigned to the Hon. Josephine L. Staton,  
Courtroom 10A ; Magistrate Judge Robert  
N. Block, Courtroom 6D]

**DEFENDANTS' NOTICE OF MOTION  
AND MOTION TO TRANSFER  
VENUE**

*[Filed concurrently with Memorandum of  
Points and Authorities in Support,  
Declarations in Support, and [Proposed]  
Order]*

Date: October 23, 2015

Time: 2:30 p.m.

Courtroom: 10A

Complaint Filed: April 8, 2015

FAC Filed: May 4, 2015

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**TO THE HONORABLE COURT, AND TO PLAINTIFF:**

PLEASE TAKE NOTICE that on October 23, 2015, at 2:30 p.m., or as soon thereafter as counsel may be heard in Courtroom 10A of the above-entitled Court, Defendants QUALITY SYSTEMS, INC. and NEXTGEN HEALTHCARE INFORMATION SYSTEMS, LLC will and hereby do move this Court for an Order transferring the venue of the above-captioned action to the United States District Court for the Eastern District of Pennsylvania.

Plaintiff TRACI WOLBERT's ("Plaintiff") action against Defendants has its nexus in the Eastern District of Pennsylvania and should be transferred there for the convenience of the Parties and witnesses, and to promote the interest of justice. In brief: (1) venue in this matter is proper in the Eastern District of Pennsylvania pursuant to 28 U.S.C. 1391; (2) Plaintiff resides in Pennsylvania; (3) all of the alleged harm occurred in Pennsylvania; (4) nearly all of the witnesses reside in Pennsylvania and (5) nearly all of the physical evidence, to the extent any exists, is located in Pennsylvania.

This Motion is made following the conference of counsel pursuant to Local Rule 7-3 which took place on September 8, 2015. (Declaration of Andrew D. La Fiura, ¶ 2.)

This Motion is based upon this Notice, the accompanying Memorandum of Points and Authorities, the Declaration of Andrew D. La Fiura, the Declaration of Steve Puckett, the Declaration of Jane Kurcon and all pleadings and papers on file herein and such further oral and documentary evidence as may be presented in any reply brief or at the hearing on this Motion.

Dated: September 18, 2015

JACKSON LEWIS P.C.

By: /s/ Andrew D. La Fiura

Andrew D. La Fiura  
Jared L. Bryan  
Vandana Kapur

Attorneys for Defendants  
QUALITY SYSTEMS, INC. and NEXTGEN  
HEALTHCARE INFORMATION SYSTEMS,  
LLC

**CERTIFICATE OF SERVICE**

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA**

CASE NAME: TRACI WOLBERT vs. QUALITY SYSTEMS, INC., ET AL.

CASE NUMBER: CV-8:15-cv-00550-JLS-RNB

I am employed in the County of ORANGE, State of California. I am over the age of 18 and not a party to the within action; my business address is 5000 Birch Street, Suite 5000, Newport Beach, CA 92660.

On September 18, 2015, I served following document(s) described as:

**DEFENDANTS' NOTICE OF MOTION AND MOTION TO TRANSFER VENUE**

on the parties in this action listed below in the manner designated below:

**PLEASE SEE ATTACHED SERVICE LIST**

☒ **BY NOTICE OF ELECTRONIC FILING.** The above-listed counsel have consented to electronic service and have been automatically served by the Notice of Electronic Filing, which is automatically generated by CM/ECF at the time said document was filed, and which constitutes service pursuant to FRCP 5(b)(2)(D).

☒ **FEDERAL** I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on September 18, 2015, at Newport Beach, California.

/s/ Lisa Uyesugi  
Lisa Uyesugi

**SERVICE LIST**

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4833-1698-6407, v. 1